

## DOCKETED

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*Comment Received From: David Edwards*

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**CEC Docket 17-ALT-01 Air Liquide Comments**

*Additional submitted attachment is included below.*

March 22, 2018

California Energy Commission  
Docket Office, 17-ALT-01  
1516 Ninth Street  
Sacramento, CA 95814

**Re: 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program**

Dear CEC Administrators,

Air Liquide Hydrogen Energy appreciates the opportunity to comment on the California Energy Commission's Draft Staff Report for the 2018- 2019 Investment Plan Update of the Alternative and Renewable Fuel and Vehicle Technology Program.

Hydrogen Mobility in California transitioning from a demonstration phase to a market expansion phase. The significant efforts of the State and industry partners has established and validated the use of hydrogen fuel cell vehicles for light duty applications in California. Today, we face the challenges related to growing the market and we have the opportunity to move forward with a shared vision of market growth and acceleration.

In line with this, we strongly support the proposed increased allocation of \$92MM for the 2018-2019 CEC Investment Plan directed toward hydrogen infrastructure. This increase is consistent with the recent Executive Order to deliver 200 stations by 2025 target. Enabling private investment in the infrastructure sector will enable market growth at the scale needed to reach the State's ZEV targets by 2030 and beyond. The resulting growth will then enable the cost reductions in stations and hydrogen supply that will be needed to insure market success.

With investment at scale as a key driver to reach the State's goals, we encourage the CEC to develop a solicitation and award process which prioritizes networks of stations and hydrogen supply in order to enable these cost reductions. **Our recommendations are to make the next phase of the program a multi-year award prioritizing network solutions rather than single station awards, prioritizing grant funds to awardees who leverage scale and schedule to provide the best \$/kg/day network capacities.**

Our comments are consistent with the industry view that priorities and efforts need to drive toward increased scale with a more aggressive schedules which enables the reduction in costs that are available. Air Liquide shares this view at a global level with several other companies who together have formed the Hydrogen Council. This council

outlined this industry viewpoint in November 2017 with the release of “Hydrogen, scaling up; A sustainable pathway for the global energy transition”<sup>1</sup>

**Given the importance and possible number of awards affected by the next solicitation, we request the CEC consider developing a draft solicitation and hosting industry feedback workshops for comments to that draft.**

We appreciate the opportunity to be involved in the discussions with the CEC and the State of California on these policy priorities and encourage further discussion in 2018.

Thank you for your consideration.



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<sup>1</sup> “Hydrogen, scaling up; A sustainable pathway for the global energy transition” November 2017; available at: [http://hydrogencouncil.com/wp-content/uploads/2017/11/Hydrogen-Scaling-up\\_Hydrogen-Council\\_2017.compressed.pdf](http://hydrogencouncil.com/wp-content/uploads/2017/11/Hydrogen-Scaling-up_Hydrogen-Council_2017.compressed.pdf)